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**Before the
Federal Communications Commission
Washington, D. C. 20554**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

Amendment of Section 73.202 (b)
Table of Allotments,
FM Broadcast Stations
(Susanville, Quincy, Corning
and Portola, California)

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MB Docket No. 04-164
RM-10548

To: Office of the Secretary

Directed to: **Assistant Division Chief
Audio Division, Media Bureau**

COUNTERPROPOSAL

Counter proposals are due in this proceeding by June 25, 2004. Eastern Sierra Broadcasting (hereinafter "ESB") hereby files a timely counterproposal.

ESB desires to propose that Channel 264A (100.7 MHz) be allocated to Portola, California as its first local service in lieu of the proposed allotment of Station Channel 262A to Susanville and the proposed re-allotment of Channel 262A Quincy, California to Channel 265A. If the Commission allocates Channel 264A to Portola, California, ESB will apply for it and if awarded a permit, ESB will construct said station.

Channel 264A can be allotted to Portola, California at the coordinates of: 39-46-11 N, 120-26-10 W. These coordinates are for a preferred transmitter site on a mountain where FM translators are presently or proposed to be located.

As seen on the attached allocation study, using this set of allotment coordinates Channel 264A, Portola, California clears KRZQ on first adjacent Channel 265A (by rounding up, as is permitted, to the nearest kilometer). This site also clears co-channel station KHTU(FM), Channel 264B, Corning, California. Additionally, from the proposed set of coordinates, Channel 264A covers all of Portola as a full Class A facility (566 meters HAAT/170 watts; equivalent to 100 meters HAAT/6 kW).

This site and channel conflict with the proposal to change of Station KHGO(FM), Quincy, California from Channel 262A to Channel 265A. This proposal clears KHGO(FM) on its present channel of 262A.

Therefore, this petitioner proposes that the Commission not move Channel 262A, KHGQ, Quincy, California to Channel 265A, and proposes that the Commission instead allocate Channel 264A to Portola, California (in lieu of allocating Channel 262A to Susanville,

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California). A search of the FM band did not turn up any other available FM channels for Portola, California. Therefore the Commission must decide between the two competing communities.

Susanville, California presently has an abundance of local radio service. On the FM side there is KJDX(FM) and KHJQ(FM) both licensed to Susanville and KKBN(FM), which is licensed to Chester, California. In addition there is an unused FM allotment on channel 242C3. This unused FM channel went unsold during the last FM auction. Therefore, a vacant channel, Channel 242C3, Susanville, California, already is on the list of available FM channels available for bid for in Auction No. 37, and an additional FM channel for Susanville is not needed. Moreover, on the AM side, there is a locally operating station on 1240 kHz, KSUE(AM), Susanville, California, and during the January 2004 AM filing window two applications were filed (for 1490 kHz, and 1390 kHz) to be licensed to Susanville.

On the other hand, Portola, California does not have any local service within it or in any other towns nearby. The only receivable service is KKOH(AM), 780 kHz, from Reno, Nevada. This station is over 50 miles away and focuses on Nevada news and not northeastern sierra California news that this rural area needs. All of the FM service that reaches Portola on paper is shadowed. Furthermore the FM stations predicted contours (mostly from Reno, Nevada) that come close to Portola drop off before fully serving the area.

Therefore this proposal could be considered a second aural service and it most certainly is a first local service.

Based upon the foregoing facts and other public interest matters, the Commission should grant this petitioner's proposal to allocate channel 264A to Portola, California as its first local service and possible second aural service.

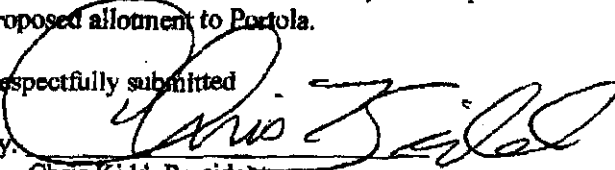
If Channel 264A is allocated to Portola, ESB will apply for said channel and pursue it through the commission's auction procedures.

The selection of this ESB proposal for channel 264A at Portola, California would render the show cause order to move station KHGQ, Quincy, California as moot. No disruption or change of any station channel is proposed under ESB's proposal.

WHEREFORE, the Commission must deny the Corey J. McCaslin petition to allocate channel 262A to Susanville, California, and grant this Counterproposal. Based upon the abundance of service already in existence or available for application, the Susanville allocation is not needed, and the public interest will be better served by the proposed allotment to Portola.

Respectfully submitted

By:


Chris Kidd, President

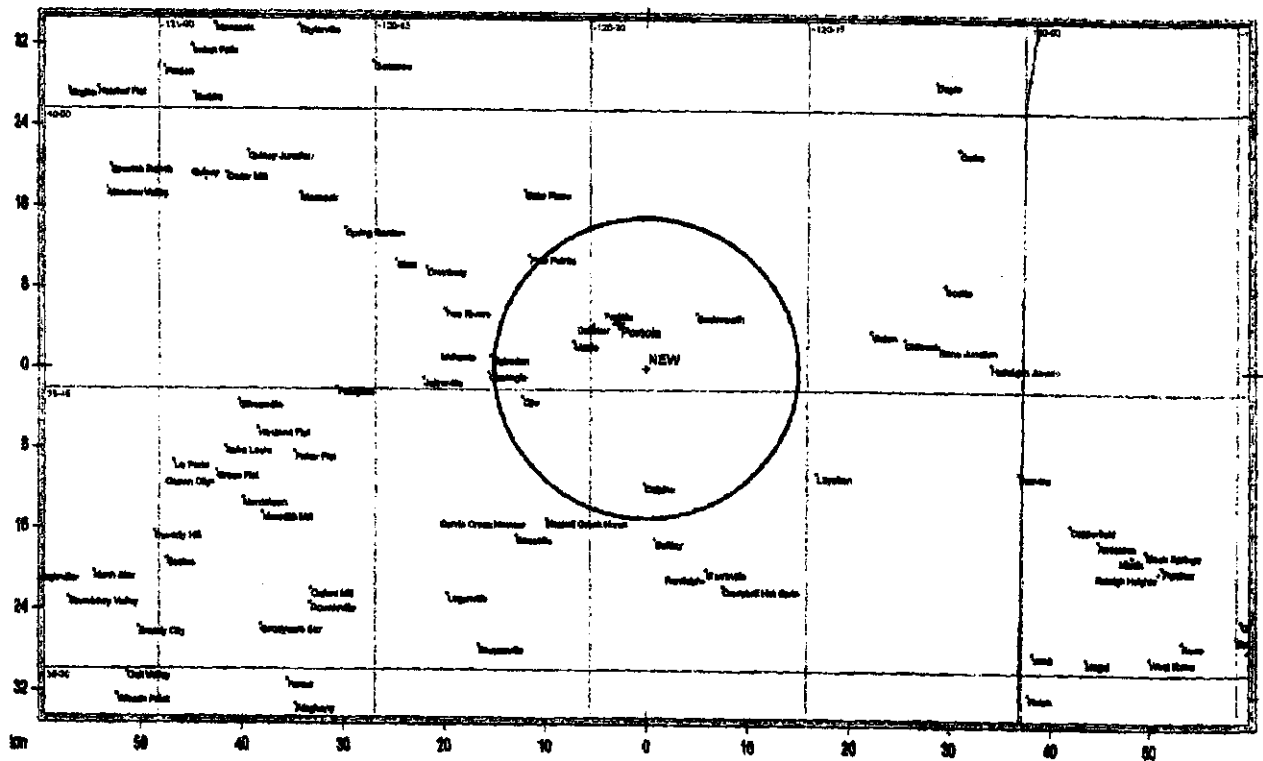
Eastern Sierra Broadcasting
P. O. Box 590
South Lake Tahoe, CA. 96156
(530) 542-2591

June 25, 2004

PORTOLA, CA CH264A 06-24-04.txt
 ComStudy 2.2 search of channel 264 (100.7 MHz Class A) at 39-46-11.0 N, 120-26-10.0 W.

CALL	CITY	ST	CH	CL	DIST	SEP	BRNG	CLEARANCE
	CORNING	CA	264	B	188.04	178.00	274.7	10.04
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	QUINCY	CA	262	A	47.52	31.00	293.3	16.52
	QUINCY	CA	265	A	47.52	72.00	293.3	-24.48
990727TC	PORTOLA	CA	211	D	0.08	0.00	142.4	0.08
KHGO	QUINCY	CA	262	A	47.52	31.00	293.3	16.52
KRZQ-FM	SPARKS	NV	265	A	71.35	72.00	128.5	-0.45
KTHU	CORNING	CA	264	B	188.04	178.00	274.7	10.04
KTHK-FM	DAYTON	NV	261	C	89.68	55.00	137.0	14.68
KTHK-FM	DAYTON	NV	261	CL	84.58	75.00	131.9	9.58
KZZO	SACRAMENTO	CA	263	B	137.39	113.00	204.4	24.39
KZZO	SACRAMENTO	CA	263	B	137.39	113.00	204.4	24.39

FOR THE RECORD AND ARCHIVAL PURPOSES
OF THE 210 DICK
P-84



6 kW ERP Class A facilities for Equivalency Determination:

Reference ERP = 6,000 kW

Reference HAAT = 100.0 meters

F(59,50) 60 dBu protected contour at 28.3 km distance

Equivalent ERP (rounded per 47 CFR 73.212) =

0.170 kW

= 566.0 meters HAAT

Unrounded ERP = 0.168 kW for 566.0 meters HAAT

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been sent via First Class Mail to the following parties:

Keily Miller
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Corey J. McCaslin
P.O. Box 7612
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A handwritten signature in black ink, appearing to read "Chris Kidd", written over a horizontal line.

Chris Kidd